

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	:
	:
– against –	:
	:
Defendants.	:
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STIPULATION AND [PROPOSED] ORDER

WHEREAS, pursuant to the Court’s Amended Opinion and Order, entered February 25, 2020 (DE 212), Plaintiff Securities and Exchange Commission (the “Commission”) is to serve and file its Second Amended Complaint by March 16, 2020;

WHEREAS, the Commission wishes to further amend its Complaint to add new charges against Defendant Ladd;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, Securities and Exchange Commission (“Commission”), and Defendant Ladd, through their respective attorneys:

1. Defendant Ladd consents to the filing of the Commission’s Second Amended Complaint, including the new charges against Defendant Ladd, by March 16, 2020; and
2. Defendant Ladd shall move, answer or otherwise respond to the Second Amended Complaint by April 30, 2020.

Dated: New York, NY
March 12, 2020

ROBERT LADD

By: /s/ Randall Lee

Cooley LLP
1333 2nd Street, Suite 400
Santa Monica, CA 90401
310-883-6485

Attorneys for Defendant Robert Ladd

SECURITIES AND EXCHANGE
COMMISSION

By:



Jack Kaufman

200 Vesey Street
Suite 400
New York, NY 10281
212-336-0106

Attorneys for Plaintiff Securities and
Exchange Commission

SO ORDERED:

UNITED STATES DISTRICT JUDGE